

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

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Haishan Yang,

Case No. 25-CV-00089(JMB/SGE)

Plaintiff,

v.

**DECLARATION OF HAISHAN  
YANG IN SUPPORT OF  
MOTION FOR REFERRAL TO  
THE PRO PROJECT**

Hannah Neprash et al.,

*in their individual and*

*official capacities,*

Defendants.

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I, Haishan Yang, declare under penalty of perjury as follows:

1. I am the Plaintiff in the above-captioned case and submit this declaration in support of my Motion for Referral to the Pro Se Project.

2. I filed a civil rights complaint under 42 U.S.C. § 1983, alleging that Defendants, officials of the University of Minnesota (“the University”), violated my procedural due process rights during a disciplinary proceeding that resulted in my expulsion.
3. My expulsion led to the loss of my international student status, causing severe financial hardship and making it impossible for me to remain in the United States legally.
4. My expulsion also led to the loss of my job as a research assistant at the University. I am currently unemployed and have no monthly income.
5. Since January 7, 2025, I have been unable to secure legal representation despite diligent efforts, including sending more than 30 emails to law firms in Minnesota. I have been unsuccessful due to both financial constraints and the complexity and novelty of this case.
6. Referral to the Pro Se Project would greatly assist me in navigating the legal process by helping me secure a consultation with a volunteer attorney or assistance in seeking legal representation.
7. Given my ongoing financial hardship, lack of legal status, and inability to secure legal counsel despite good-faith efforts, I respectfully request that this Motion be considered on an expedited basis if the Court deems it appropriate.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: February 18, 2025

Respectfully submitted,

Haishan Yang

Handwritten signature of Haishan Yang in Chinese characters: 杨海山

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